

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**THE PLUMBING SUPPLY, LLC, d/b/a**  
**FAUCET WORKS,**  
**Plaintiff,**

**14-cv-3674 (VLB)**

**- against -**

**ECF CASE**

**EXXONMOBIL OIL**  
**CORPORATION,**  
**EXXON MOBIL CORP., CPD NY**  
**ENERGY CORPORATION, CUMBERLAND**  
**FARMS, INC., ILLINOIS UNION**  
**INSURANCE COMPANY, and**  
**JOHN DOES 1-10,**

**Defendants.**

**CPD NY ENERGY CORPORATION,**

**Defendant and Third-Party Plaintiff,**

**CUMBERLAND FARMS, INC., GROUNDWATER**

**;**  
**& ENVIRONMENTAL SERVICES, INC., and JOHN**  
**DOES 1-10,**

**Third-Party Defendants.**  
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**DECLARATION OF ERIC LINDQUIST IN  
FURTHER SUPPORT OF PLAINTIFF'S MOTION  
TO AMEND THE COMPLAINT**

1. I am an attorney duly licensed to practice in the state of New York. I am of counsel to the firm of Cermele & Wood LLP, attorneys for Plaintiff The Plumbing Supply, d/b/a Faucet Works. I am fully familiar with the facts and circumstances set forth herein.

2. Exhibit A appended hereto is a true copy of Endorsement No. 13 to the Illinois Union Insurance Company (“IU”) policy of insurance issued to defendant CPD NY Energy Corporation (“CPD”) dated 4/20/2011.

3. Exhibit B appended hereto is a true copy of Endorsement No. 14 to the Policy (undated).

4. Exhibit C appended hereto is a true copy an e-mail to undersigned counsel from attorney John Barone, counsel for CPD, dated October 4, 2018.

5. Exhibit D appended hereto is true copy of the Summons and Complaint filed in the Westchester County Supreme Court in the matter of The Plumbing Supply LLC et al. v. Ground Water and Environmental Services, Inc. et al., Index No. 67660/2018.

6. Exhibit E appended hereto is a true copy of the Summons and Complaint filed in the Westchester Supreme Court in the matter of The Plumbing Supply LLC et al. v. Cumberland Farms Inc. et al., Index No. 67680/2018.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 14, 2018

/s/ Eric Lindquist  
ERIC LINDQUIST, ESQ.